

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

Armada Operating, Llc

Debtor(s)

Case No. 15-41556
Chapter 7

**MOTION TO APPROVE SALE OF PROPERTY FREE OF LIENS, CLAIMS
AND ENCUMBRANCES, WITH LIENS, CLAIMS AND ENCUMBRANCES
TO ATTACH TO SALES PROCEEDS**

NO HEARING WILL BE CONDUCTED ON THIS APPLICATION UNLESS A WRITTEN OBJECTION IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AND SERVED UPON THE PARTY FILING THIS PLEADING WITHIN TWENTY-ONE (21) DAYS FROM DATE OF SERVICE UNLESS THE COURT SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION. IF NO OBJECTION IS TIMELY SERVED AND FILED, THIS PLEADING SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. IF AN OBJECTION IS FILED AND SERVED IN A TIMELY MANNER, THE COURT WILL THEREAFTER SET A HEARING. THE COURT RESERVES THE RIGHT TO SET A HEARING ON ANY MATTER.

COMES NOW, Linda Payne, the duly qualified and acting Chapter 7 Trustee for the above styled and numbered cause, and files this Motion to Approve Sale of Interest in Property Free of Liens, Claims and Encumbrances, with Liens, Claims and Encumbrances to Attach to Sales Proceeds (the “Motion”), pursuant to 11 U.S.C. §363(f) and Fed.R.Bankr.P. 6004(c), and in support hereof, would show the court as follows:

1. This Court has jurisdiction to hear this matter pursuant to 28 U.S.C. §§ 1334 and 157. This matter involves the sale of property of the estate and, thus, constitutes a core proceeding under 28 U.S.C. § 157(b)(2)(A) and (N).

2. On August 28, 2015 (“Petition Date”) Armada Operating, LLC (“Debtor”) filed a voluntary petition under Chapter 7 of Title 11 of the United States Code (the “Bankruptcy Code”) commencing the above-referenced bankruptcy proceeding. Movant is the Chapter 7 Trustee appointed in this case.

3. As of the Petition Date, two of the assets identified by Debtor on Schedule B of

its bankruptcy schedules are a 2012 Ford F-150 pickup and a 2008 Honda 4X4 ATV (the “Property”).

4. As of the Petition Date, the Debtor valued the Property at approximately \$12,000.00 and \$1,500.00 respectively.

5. Trustee has received an offer to purchase the Property from Tom Splechter, whose address is 1077 Osage Road, Yates Center, KS 66783 (“Purchaser”) for the sum of \$4,500.00 (the “Purchase Price”).

6. Trustee requests authority to sell the Property to Purchaser. Trustee believes the Purchase Price represents the fair market value of the Property and is in the best interest of the estate. The 2012 Ford F150 pickup has 100,000 miles and needs new tires. If the Property had to be picked up, moved and auctioned, the expenses would overshadow the value. The Trustee requests that (i) the sale be made “as is, where is” without any representations or warranties concerning the condition of the Property; and (ii) that no obligation, warranty or personal liability shall be placed on Trustee in any capacity, other than as Trustee of this estate.

7. Trustee requests authority to sell the Property free and clear of all liens, claims and encumbrances pursuant to Section 363(f)(3), (4) and/or (5) of the Bankruptcy Code with such liens, claims and encumbrances attaching to the sales proceeds.

8. Trustee further requests authorization to execute all documents necessary to consummate the closing of an approved sale.

PRAYER

WHEREFORE, Trustee prays that the Court enter an order pursuant to 11 U.S.C. § 363(f) authorizing her to sell the Property to Purchaser as described above free and clear of any and all

liens, claims and encumbrances with any and all such liens, claims and encumbrances attaching to the sale proceeds and granting the Trustee such other and further relief to which she is justly entitled.

Dated: September 23, 2015

Respectfully submitted,

THE MOORE LAW FIRM, L.L.P.

/s/ Bill F. Payne
BILL F. PAYNE, SBN 15649500
100 North Main Street
Paris, Texas 75460
Telephone 903-784-4393 or 972-628-4901
Facsimile 903-785-0312

ATTORNEY FOR TRUSTEE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing document was served on the persons listed on the attached mailing matrix through the court's electronic notification system as permitted by Appendix 5005 to the Local Rules of the U.S. Bankruptcy Court for the Eastern District of Texas, or by first class United States Mail, postage pre-paid, on September 23, 2015.

/s/ Bill F. Payne
Bill F. Payne

Label Matrix for local noticing

0540-4

Case 15-41556

Eastern District of Texas

Sherman

Wed Sep 23 10:08:44 CDT 2015

Archer Directional Drilling Services, LLC
 c/o Carl Dore', Jr.
 Dore' Law Group, P.C.
 17171 Park Row, Suite 160
 Houston, TX 77084-4927

Armada Operating, LLC
 5220 Spring Valley Rd
 Suite 615
 Dallas, TX 75254-2431

Jennifer Klein Ayers
 K&L GATES, LLP
 1717 Main Street, Suite 2800
 Dallas, TX 75201-7342

Bio-Action, Inc
 P O Box 2425
 Casper WY 82602-2425

Collins Automotive
 P O Box 22
 Piqua KS 66761-0022

D & D Propane, Inc
 P O Box 296
 Humboldt KS 66748-0296

Decollement Consulting, Inc
 13300 Braun Rd
 Golden CO 80401-1645

Delta Seaboard, LLC
 1212 W Sam Houston Pkwy N
 Houston TX 77043-4009

Carl Dore
 Dore Law Group, PC
 17171 Park Row, Ste 160
 Houston, TX 77084-4927

Everardo Rodriguez
 519 S Cedar Street
 Garnett KS 66032-1517

Frontier Drilling, LLC
 1608 NW Expressway, Ste 102
 Oklahoma City OK 73118-1440

(p)INTERNAL REVENUE SERVICE
 CENTRALIZED INSOLVENCY OPERATIONS
 PO BOX 7346
 PHILADELPHIA PA 19101-7346

Lyon-Coffey Electric Cooperative Inc
 P O Box 229
 Burlington KS 66839-0229

Maclaskey Oilfield Services, Inc
 105 N Industrial Road
 El Dorado KS 67042

Zachary S. McKay
 Dore Law Group, P.C.
 17171 Park Row, Suite 160
 Houston, TX 77084-4927

Midwest Surveys, Inc
 P O Box 68
 Osawatomie KS 66064-0068

NOV Tuboscope
 7909 Parkwood Circle Drive
 Houston TX 77036-6565

Oil Patch Pump & Supply, Inc
 Iola Store
 P O Box 591
 Chanute KS 66720-0591

Pason Systems USA Corp
 16035 Table Mountain Parkway
 Golden CO 80403-1642

Linda S Payne
 Chapter 7 Bankruptcy Trustee
 12270 Coit Road, Suite 541
 Dallas, TX 75251

Piqua Farmers Co-operative Assn
 201 S Washington
 Piqua KS 66761-1673

Railroad Commission Of Texas
 P-5 Financial Assurance Unit
 P O Box 12967
 Austin TX 78711-2967

Reef Services, LLC
 P O Box 203187
 Dept 18703
 Dallas TX 75320-3187

Sievers Auto, Inc
 806 W Mary
 Yates Center KS 66783-2300

Smith International, Inc
 P O Box 732136
 Dallas TX 75373-2136

TS Construction General Contractor
 1586 Highway 54
 Yates Center KS 66783-5201

Tforce Energy Services, Inc
 6143 S Willow Dr, Ste 230
 Englewood CO 80111-5124

Twin Motors Ford, Inc
P O Box 844
Iola KS 66749-0844

U.S. Attorney General
Department of Justice
Main Justice Building
10th & Constitution Ave., NW
Washington, DC 20530-0001

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ZECO Equipment, LLC
P O Box 1459
Vernal UT 84078-1459

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Internal Revenue Service
Special Procedures
1100 Commerce, Room 951
STOP 5025 DAL
Dallas TX 75242

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Prosperity Bank

End of Label Matrix	
Mailable recipients	38
Bypassed recipients	1
Total	39